

[Parties and Counsel Listed on Signature Pages]

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Civil Case No. 4:22-md-03047-YGR-PHK

4:23-cv-05448-YGR

**META AND STATE AGS' STIPULATION
AND [PROPOSED] ORDER EXTENDING
DEADLINES TO COMPLETE STATE
WITNESS DEPOSITIONS**

Honorable Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

1 Pursuant to Civil Local Rules 6-2 and 7-12, the State Attorneys General (“State AGs”) and
2 Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms
3 Technologies, LLC (collectively, “Meta,” and together, the “Parties”), through their undersigned counsel,
4 hereby stipulate as follows:

5
6 1. Under the schedule ordered by Magistrate Judge Kang on February 13, 2025 (ECF 1696),
7 the current deadline for Meta to complete fact and Rule 30(b)(6) depositions of State witnesses is July 18,
8 2025. *See* ECF 1696.

9 2. In accordance with the schedule set by the Court, the Parties have worked to confer about,
10 notice, and schedule the fact and Rule 30(b)(6) depositions of State witnesses; amicably resolved various
11 disputes about scheduling, scope, and other issues; scheduled over 130 State witness depositions to occur
12 on or before July 18, 2025; are working to schedule additional State witness depositions; and are
13 proceeding with the scheduled depositions (which are ongoing).

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15 3. The Parties submitted their most recent joint letter brief concerning the scope of Meta’s
16 Amended Rule 30(b)(6) Notice to the States on March 28, 2025, and agreed that no depositions of any
17 witnesses designated to provide testimony in connection with Meta’s Amended Rule 30(b)(6) Notices to
18 State Plaintiffs shall occur until at least fourteen days have passed from the date upon which the Court
19 decided that joint letter brief. *See* ECF 1807, 1858. The Court issued that order on May 19, 2025. ECF
20 1964.

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22 4. On June 9, 2025, in connection with Rule 30(b)(6) depositions of Meta, the Court ordered
23 plaintiffs’ counsel to serve copies of every document which they in good faith expect to ask about or use
24 as an exhibit at an upcoming 30(b)(6) deposition session. ECF 2024.

25 5. In light of (a) the timing of the Court’s order regarding the scope of Meta’s Amended Rule
26 30(b)(6) Notice, (b) the number of State witness depositions that already are scheduled to occur on or
27 before July 18, 2025, (c) the unavailability of certain State witness until after July 18, 2025, (d) the Parties’
28

1 efforts to resolve outstanding document and deposition discovery disputes, (e) the continuing production
2 to Meta by some state agencies of documents into June 2025, and (e) the State AGs' June 11, 2025 request
3 that Meta provide advanced identification of all documents that Meta in good faith expects to use at any
4 upcoming Rule 30(b)(6) deposition session of a state plaintiff, the Parties have agreed to extend the
5 deadline for Meta to complete fact and Rule 30(b)(6) depositions of State witnesses (as defined in ECF
6 1696), and a process for Meta to pre-identify all documents that Meta expects to use in good faith at any
7 Rule 30(b)(6) deposition session of a state plaintiff, as provided below.,

8
9 6. This Court has previously extended Meta's deadline to complete fact and Rule 30(b)(6)
10 depositions of State witnesses once. *See* ECF 1696. This stipulated extension of the deadline for Meta to
11 complete fact and Rule 30(b)(6) depositions of State witnesses does not and will not affect any other
12 deadlines already set or that may be set in this action, nor the deposition time limits already set in ECF
13 1696, nor does it affect any party's or non-party's rights in relation to any other deadlines.

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15 7. Therefore, the Parties agree that the following shall apply:

- 16 a. Meta shall pre-identify all documents it in good faith expects to use in an upcoming
17 30(b)(6) deposition session no later than five business days in advance of such
18 upcoming deposition session.¹ The state plaintiffs shall prepare their 30(b)(6)
19 designee(s) to testify about any such documents timely identified prior to the
20 upcoming deposition session. At such upcoming 30(b)(6) deposition session, Meta
21 shall not ask questions about any other specific documents that were not so timely
22 identified. However, if a state plaintiff's counsel opens the door and questions a
23 30(b)(6) designee on redirect concerning a document not included in the documents
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27 ¹ The term "documents" includes any document, regardless of whether it was previously produced in this
28 action or identified by Meta through other lawful means (e.g., located through a public website or other
publicly available source).

1 identified by Meta before the deposition session, then on recross Meta shall be
2 entitled to question the witness about any such documents used as an exhibit or
3 raised by the state plaintiff's counsel. Nothing prohibits the Parties from reaching
4 agreement on allowing any questioning of a 30(b)(6) designee concerning any
5 document not timely identified before the deposition session.
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7 b. Subject to extenuating circumstances, Meta will notify the relevant State AG at
8 least two weeks in advance if it intends to forgo a 30(b)(6) deposition of the state
9 plaintiff's Rule 30(b)(6) designee(s).

10 c. Subject to the Court's approval, Meta's deadline to complete fact and Rule 30(b)(6)
11 depositions of State witnesses (as defined in ECF 1696) shall be extended through
12 and including August 29, 2025, except that Meta's deadline to complete the Rule
13 30(b)(6) depositions of the People of the State of California and the Commonwealth
14 of Kentucky witnesses shall be extended through and including August 8, 2025.
15

16 d. Meta shall work with the State AGs that are involved in expert discovery to
17 minimize disruptions to expert discovery that may result from fact and Rule
18 30(b)(6) depositions of State witnesses.

19 e. The State AGs reserve all rights related to the 30(b)(6) depositions. This agreement
20 does not constitute a waiver of any objections the State AGs may raise with respect
21 to these depositions, nor does it alter any requirements or limitations imposed on
22 these depositions by previous court orders, aside from the deadline for completion
23 of such depositions.
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25 f. Meta reserves all rights related to the 30(b)(6) depositions, including without
26 limitation the right to dispute any objections that the State AGs may raise.
27
28

1 Respectfully submitted,

2 DATED: July 1, 2025

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ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: July 1, 2025

By: /s/ Ashley M. Simonsen

[PROPOSED] ORDER

By agreement of the Parties, and for good cause shown, **IT IS SO ORDERED.**

Dated: _____, 2025

Magistrate Judge Hon. Peter H. Kang